

Honorable Karen L. Strombom

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON, AT TACOMA

EMPLOYEE PAINTERS' TRUST HEALTH &
WELFARE FUND; WESTERN
WASHINGTON PAINTERS DEFINED
CONTRIBUTION PENSION TRUST;
DISTRICT COUNCIL NO. 5
APPRENTICESHIP AND TRAINING TRUST
FUND; WESTERN WASHINGTON
PAINTERS LABOR MANAGEMENT
COOPERATION TRUST; INTERNATIONAL
UNION OF PAINTERS AND ALLIED
TRADES INDUSTRY PENSION FUND; and
INTERNATIONAL UNION OF PAINTERS
AND ALLIED TRADES DISTRICT
COUNCIL NO. 5

Plaintiffs / Judgment Creditors,

v.

STEVEN RAY FREEMIRE and JOAN
MARIE FREEMIRE, husband and wife and the
marital community comprised thereof; and
PICTURE PERFECT PAINTING, INC., a
Washington corporation,

Defendants / Judgment Debtors.

Case No.: 3:14-mc-05019-KLS

ORDER FOR JUDGMENT DEBTOR
EXAMINATION OF STEVEN RAY
FREEMIRE, INDIVIDUALLY AND AS
PRESIDENT OF PICTURE PERFECT
PAINTING, INC.

Having considered Plaintiffs' Motion for Judgment Debtor Examination of Steven Ray Freemire, on behalf of himself and the martial community with his wife, Joan Marie Freemire, and as President of Picture Perfect Painting, Inc., and the Declaration of Michael A. Urban, and good cause appearing,

Order for Judgment Debtor Exam
of Steven Ray Freemire, et al.
(Case No.: 3:14-mc-05019-KLS)

THE URBAN LAW FIRM
and
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Counsel for Plaintiffs

IT IS HEREBY ORDERED that Steven Ray Freemire, on behalf of himself and the marital community with his wife, Joan Marie Freemire, and as President of Picture Perfect Painting, Inc., Defendants/Judgment Debtors, appear in Courtroom F, at the United States District Court for the Western District of Washington, located at 1717 Pacific Avenue, Tacoma, WA 98402-3200, on the 17th day of November, 2014, at 10:00 a.m., to be sworn in for a Judgment Debtor Examination and answer concerning property subject to the ownership and control of himself and Joan Marie Freemire, husband and wife, and Picture Perfect Painting, Inc.

IT IS FURTHER ORDERED that Steven Ray Freemire, on behalf of himself and the marital community with his wife, Joan Marie Freemire ("Debtor") and as President of Picture Perfect Painting, Inc. ("Debtor Company"), no later than seven days prior to the examination set above, produce to The Urban Law Firm, 4270 S. Decatur Blvd., Ste. A-9, Las Vegas, NV 89103 or such other location as the parties may agree, the following documents under their control or under the control of their agents, attorneys, or accountants:

1. All financial statements prepared by or on behalf of Debtor and Debtor Company from June 1, 2013, to the present.

2. All original monthly bank statements of Debtor and Debtor Company from June 1, 2013, to the present.

3. All original savings account pass books, certificates of deposit, and trust certificates in the name of Debtor and Debtor Company from June 1, 2013, to the present.

4. All original negotiable instruments and negotiable securities in the name of Debtor and Debtor Company from June 1, 2013, to the present.

5. All evidence or other memoranda of any ownership interest of Debtor and Debtor Company in any other corporation, partnership, unincorporated association, or any business organized or conducted for the production of income from June 1, 2013, to the present.

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6. All evidence or other memoranda of any income received by Debtor and Debtor Company from June 1, 2013, to the present, including without limitation tax returns, insurance proceeds, or repayment of loans.

7. All evidence or other memoranda of any employer or place of work or employment of Debtor and Debtor Company from June 1, 2013, to the present, including without limitation contracts, invoices, billings, vouchers, or payments.

8. All evidence of any ownership interest of Debtor and Debtor Company, including without limitation bills of sale, pink slips, or any other record or title, in any motor vehicle, airplane, boat, equipment, or machinery, from June 1, 2013, to the present.

9. All evidence of any debts or repayments owed by Debtor and Debtor Company, including without limitation those arising from loans or judgments from June 1, 2013, to the present.

10. Any and all evidence or other memoranda indicating that Debtor and Debtor Company was either a plaintiff or a defendant in any lawsuit from June 1, 2013, to the present.

11. Any and all evidence or memoranda indicating that Debtor and Debtor Company received any judgment, award, bequest, or devise in any lawsuit or other court action from June 1, 2013, to the present.

12. Any and all evidence or memoranda indicating any ownership interest of Debtor and Debtor Company in any patent, invention, trade name, or copyright.

13. Any and all evidence or memoranda indicating an ownership interest of Debtor and Debtor Company in any real property or developments on real property.

14. Any and all evidence of the sale(s) of any real or personal property of Debtor and Debtor Company from June 1, 2013, to the present.

15. Any and all loan applications filled out by Debtor and Debtor Company since June 1, 2013.

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1 16. Copies of all documents evidencing the sale or transfer of any assets of Debtor and
2 Debtor Company from June 1, 2013, to the present.

3 17. Any and all documents evidencing any federal or state tax liability of Debtor and Debtor
4 Company.

5 18. All accounts receivable of Debtor and Debtor Company from June 1, 2013, to the
6 present.

7 19. Original cash disbursement journals and check registers maintained in connection with
8 any business of Debtor and Debtor Company from June 1, 2013, to the present.

9 20. Federal income tax returns of Debtor and Debtor Company for the years 2012 and 2013.

10 21. All payroll records and time cards of Debtor Company from June 1, 2013, to the present.

11 22. All accounts receivable of Debtor Company from June 1, 2013, to the present.

12 23. All daily job logs, diaries, or foreman reports of Debtor Company from June 1, 2013, to
13 the present.

14 24. All daily job tickets or invoices of Debtor Company from June 1, 2013, to the present.

15 25. All daily job tickets or invoices of Debtor Company for work performed for Debtor
16 Company from June 1, 2013, to the present.

17 26. All canceled checks drawn on any account established in the name of Debtor and Debtor
18 Company from June 1, 2013, to the present.

19 To the extent records responsive to the above items were already produced for the prior
20 Judgment Debtor Examination held on June 3, 2013, Debtor's and Debtor Company's obligations to
21 produce responsive records extends only to supplementing the prior responses with more current
22 information.

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NOTICE TO THE JUDGMENT DEBTOR

**IF YOU FAIL TO APPEAR AT THE TIME AND PLACE SPECIFIED IN THIS ORDER,
YOU MAY BE SUBJECT TO ARREST AND PUNISHMENT FOR CONTEMPT OF COURT
AND THE COURT MAY MAKE AN ORDER REQUIRING YOU TO PAY REASONABLE
ATTORNEY'S FEES INCURRED BY THE JUDGMENT CREDITOR IN THIS PROCEEDING.**

DATED this 24th day of September, 2014.


Karen L. Strombom
United States Magistrate Judge

Submitted by:

THE URBAN LAW FIRM

/s/ Michael A. Urban
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